

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

DISPLAY TECHNOLOGIES, LLC,

Plaintiff,

v.

NVIDIA CORPORATION,

Defendant.

Civil Action No. 2:15-cv-998

JURY TRIAL DEMANDED

JOINT MOTION TO SET ASIDE CLERK'S ENTRY OF DEFAULT

On or about June 19, 2015, Plaintiff Display Technologies, LLC (“Display”) served a Summons and Amended Complaint on Defendant NVIDIA Corporation (“NVIDIA”) in this action. (Dkt. 13.) On April 21, 2016, Display filed a motion for the entry of default against NVIDIA. (Dkt. 82.) On April 21, 2016, the Clerk of this Court entered NVIDIA’s default. (Dkt. 83.)

NVIDIA’s failure to answer or otherwise respond to Display’s Amended Complaint was inadvertent, and NVIDIA believes that it has meritorious defenses to the claims set forth in the Amended Complaint. Although this action was previously consolidated with other actions filed by Display relating to the same asserted patent, all of those other consolidated actions have now been dismissed. Display, therefore, will not be prejudiced if the entry of NVIDIA’s default is set aside.

Accordingly, NVIDIA and Display respectfully request that the Court set aside the entry of NVIDIA's default and that NVIDIA be given until May 31, 2016 to answer or otherwise respond to Display's Amended Complaint.

Dated: April 28, 2016

Respectfully submitted,

/s/ J. Mark Mann

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